

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF INDIANA**

ARCELORMITTAL USA LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
ALBERT ARILLOTTA,	)	No. 2:15-cv-239
GLOBAL DEMOLITION AND	)	
RECYCLING, LLC,	)	
NMC METALS CORPORATION, and	)	
ARILLOTTA ENTERPRISES, LLC.,	)	
	)	
Defendants.	)	

**ARCELORMITTAL USA LLC’S MOTION FOR DEFAULT JUDGMENT**

Plaintiff ArcelorMittal USA LLC (“ArcelorMittal”), by and through its attorneys Swanson, Martin & Bell, LLP, pursuant to Rule 55(b) of the Federal Rules of Civil Procedure respectfully moves the Court to entry a default judgment in favor of ArcelorMittal and against the Defendants, that the Court **permanently enjoin** the Defendants, their officers, agents, and employees from (1) forging contracts with ArcelorMittal; (2) presenting forged contracts to factoring companies like Versant Funding or any other company; (3) misrepresenting an association or affiliation with ArcelorMittal; (4) misusing ArcelorMittal’s registered trademarks; and (5) continuing to contact ArcelorMittal employees, and that the Court **enter an award of damages** in favor of ArcelorMittal USA LLC and against the defendants in the amount of \$46,004.62, and that the Court **enter** such further relief as is just, proper, and necessary, including the costs of filing this action. ArcelorMittal incorporates its contemporaneously filed memorandum of law in support of this motion.

WHEREFORE, Plaintiff ArcelorMittal USA LLC respectfully requests that this Court grant its Motion for Default Judgment against the Defendants; enjoin the Defendants conduct; enter an award of damages of \$46,004.62 in ArcelorMittal's favor; and enter such further relief as is just, proper, and necessary.

Respectfully submitted,

**ARCELORMITTAL USA LLC**

By: /s/ T. Allon Renfro  
One of its Attorneys

Matthew S. Ver Steeg  
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**CERTIFICATE OF SERVICE**

This is to certify that on September 22, 2015, a copy of the foregoing Motion was filed electronically. I hereby certify that on September 22, 2015, a true and correct copy of the foregoing Motion for Default Judgment was served by U.S. first class mail, postage prepaid, upon the following:

Albert Arillotta  
171 Phillips Avenue  
Swampscott, MA 01907

Global Demolition and Recycling LLC  
c/o Albert Arillotta  
171 Phillips Avenue  
Swampscott, MA 01907

NMC Metals Corporation  
c/o Albert Arillotta  
171 Phillips Avenue  
Swampscott, MA 01907

Arillotta Enterprises L.L.C.  
c/o Albert Arillotta  
171 Phillips Avenue  
Swampscott, MA 01907

By: /s/ T. Allon Renfro  
T. Allon Renfro